

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

THE ESTATE (SUCCESSION) OF DORIS  
IGOIN, LAURENCE APFELBAUM,  
individually and in her capacities as executor  
and beneficiary of the Estate (Succession) of  
Doris Igoi, and EMILIE APFELBAUM,

Defendants.

Adv. Pro. No. 10-04336 (SMB)

**STIPULATION EXTENDING DEFENDANTS' TIME TO RESPOND TO COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between the  
undersigned herein, that the time for Defendants The Estate (Succession) of Doris Igoi,  
Laurence Apfelbaum, individually and in her capacities as executor and beneficiary of the Estate  
(Succession) of Doris Igoi, and Emilie Apfelbaum ("Defendants") to answer, move against, or

otherwise respond to the Trustee's Complaint, filed in the above-captioned case, is extended up to and including March 6, 2015.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including, without limitation, any defenses based on lack of jurisdiction.

**IT IS FURTHER STIPULATED AND AGREED** that this stipulation may be signed by counsel for the parties in counterparts and by facsimile.

<sup>19</sup>  
Dated: February 18, 2015

**BAKER & HOSTETLER LLP**

By: 

David J. Sheehan  
Nicholas J. Cremona  
Tracy Cole  
Ona T. Wang  
David M. McMillan  
45 Rockefeller Plaza  
New York, New York 10111  
(212) 589-4200

*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Substantively  
Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L.  
Madoff*

**KELLEY DRYE & WARREN LLP**

By: 

Jonathan K. Cooperman  
Jessica L. Klarfeld  
101 Park Avenue  
New York, New York 10178  
(212) 808-7800

*Attorneys for Defendants The Estate  
(Succession) of Doris Igoi, Laurence  
Apfelbaum, and Emilie Apfelbaum*